

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

**IN RE: CENTURYLINK SALES
PRACTICES AND SECURITIES
LITIGATION**

MDL No. 17-2795 (MJD/KMM)

This Document Relates to:

Oral Argument Requested

Civil Action No. 18-296 (MJD/KMM)

**DEFENDANTS' MOTION FOR LEAVE TO REOPEN DEPOSITION OF
MICHAEL L. HARTZMARK AND FILE SUR-REPLY,
TO ADJOURN CLASS CERTIFICATION HEARING,
AND TO ORDER AN EVIDENTIARY HEARING**

Defendants CenturyLink, Inc., Glen F. Post, III, R. Stewart Ewing, Jr., David D. Cole, Karen Puckett, Dean J. Douglas, and G. Clay Bailey, by their counsel, hereby move this Court for entry of an Order in the above-captioned action:

(1) granting leave for Defendants to reopen the deposition of Plaintiffs' class certification expert Michael L. Hartzmark and continue the deposition for a period of no more than four hours;

(2) granting leave for Defendants to file a 3,000-word sur-reply in further opposition to Plaintiffs' Motion for Class Certification, Appointment of Class Representatives and Appointment of Class Counsel (the "Motion") on or before May 29, 2020;

(3) adjourning the hearing on Plaintiffs' Motion, which is currently scheduled for May 21, 2020; and

(4) scheduling an in-person evidentiary hearing in conjunction with oral argument on Plaintiffs' Motion on a date that the Court sees fit.

This Motion is based on this Notice of Motion, the accompanying Memorandum of Law in Support of Defendants' Motion for Leave to Reopen Deposition of Michael L. Hartzmark and File Sur-Reply, to Adjourn Class Certification Hearing, and to Order an Evidentiary Hearing; the Declaration of Ryan Blair with supporting exhibits; the papers and pleadings filed in this action; and such further argument and matters as may be offered at the time of the hearing on this Motion.

Dated: May 8, 2020

Respectfully submitted,

/s/ Patrick Gibbs

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